

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2005 FEB 15 P 4:14

U.S. DISTRICT COURT
DISTRICT OF MASS.

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
JANE DOES 1 through 5,

Defendants.

Civil Action
No. 04-10535 PBS

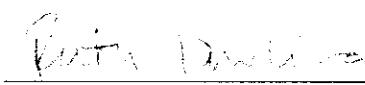
**PLAINTIFF SHAREHOLDER.COM'S MOTION TO IMPOUND ITS MOTION
FOR LEAVE TO AMEND THE COMPLAINT, MEMORANDUM IN SUPPORT
OF ITS MOTION FOR LEAVE TO AMEND THE COMPLAINT, AND SECOND
AMENDED COMPLAINT.**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Motion for Leave to Amend the Complaint and its Memorandum in Support of its Motion for Leave to Amend the Complaint. In addition, should this Court grant Shareholder.com leave to amend, Shareholder.com moves for impoundment of the Second Amended Complaint. The motion, accompanying memorandum, and Second Amended Complaint contain information the defendants have designated as "Confidential." Under the parties Stipulated Protective Order (attached hereto as Exhibit A), Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" information. *See* Stipulated Protective Order at ¶ 14.

Shareholder.com was hesitant to move for impoundment of these documents given that the information contained within them constitutes the factual basis for the

amended pleading. Therefore, Shareholder.com sought the defendants' agreement not to impound this motion, the accompanying memorandum, or the attached Second Amended Complaint. Defendants' counsel responded that he would not assent to that request. Therefore, in the absence of the defendants' assent, Shareholder.com reluctantly moves for impoundment as required by the Stipulated Protective Order.

Respectfully submitted,



Thane D. Scott (BBO# 449340)
Ruth T. Dowling (BBO# 645568)
John T. Bennett (BBO# 648464)
PALMER & DODGE LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0100

February 15, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand on February 15, 2005.



Ruth T. Dowling

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that they conferred with defendants' counsel and were unable to obtain counsel's agreement to file the motion to amend and related documents without this accompanying motion for impoundment.



Ruth T. Dowling